



Houston-Galveston Area Council

Office of the Executive Director

August 17, 2010

The Honorable Bryan W. Shaw, Ph.D.
Chairman
Texas Commission on Environmental Quality
P.O. Box 13087, Mail Code 100
Austin, TX 78711-3087

RE: Comments on non-attainment boundaries for 2010 revisions to the federal ozone standard

Dear Commissioner Shaw:

At its meeting today, the Houston-Galveston Area Council (H-GAC) Board of Directors voted to recommend that the Houston-Galveston-Brazoria (HGB) nonattainment area remain eight counties under the proposed National Ambient Air Quality Standard (NAAQS) revision. The U.S. Environmental Protection Agency (EPA) expects to issue ozone standards by August 31, 2010 which will include an 8-hour primary ozone standard in the range of 0.060 and 0.070 parts per million (ppm). The Board of Directors may amend or make further comments once EPA issues the final standards.

Based on 2005 Census estimates and Clean Air Act provisions, EPA may consider adding Austin, Matagorda, San Jacinto, and Walker counties to the HGB nonattainment region. Based on our review of EPA guidance, from March 2000, H-GAC finds that no additional counties should be added to the existing HGB nonattainment area. Industrial emissions are limited since the counties are primarily agricultural with two counties having significant national forest land. According to Texas State Data Center projections, the counties will remain rural with modest population increases or decreases expected through 2020. Furthermore, few significant emission control measures could be effectively implemented because all four counties are subject to vehicle fuel standards. Commuters from the four counties who travel into the current nonattainment region make up less than one percent of total commuters.

There is a valid concern regarding permitting of major new point or stationary sources located adjacent to the nonattainment area and the impact these new sources may have on overall air quality region wide. This becomes an even larger concern as the range of the proposed new ozone standard is approaching background levels for ozone and may call for additional data and analysis of impacts on the nonattainment area.

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Under the 2008 eight hour ozone standard the H-GAC Board of Directors recommended that the Houston-Galveston-Brazoria nonattainment area remains eight counties for the same reasons listed above. Without additional guidance the H-GAC Board of Directors continues to recommend that the HGB nonattainment boundaries remain unchanged under the proposed ozone NAAQS revision. We hope you consider these comments as you formulate your recommendations to the Governor.

Sincerely,

A handwritten signature in black ink, appearing to read "Jack Steele", written in a cursive style.

Jack Steele

cc: Buddy Garcia, Commissioner, TCEQ
Carlos Rubinstein, Commissioner, TCEQ
Margie McAllister, Air Quality Division, TCEQ